

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**URGENT CONSENTED MOTION FOR EXTENSION OF TIME TO FILE LIMITED  
OBJECTION AND JOINDER**

To the Honorable United States Magistrate Judge Judith G. Dein:

Wells Fargo Bank, National Association; Wells Fargo Clearing Services LLC AKA or FKA First Clearing LLC; and Wells Fargo Securities, LLC (collectively “Wells Fargo”) submit this motion for an extension of time to file the *Limited Objection and Joinder of Wells Fargo to the Joint Limited Objection of Bank Defendants to Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders*, in the form attached hereto as Exhibit A. In support of this Motion, Wells Fargo states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title II case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On May 7, 2019, the Financial Oversight and Management Board of Puerto Rico (“FOMB”) filed its *Urgent Motion to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders* (ECF No. 6854) (“Urgent Motion”). That same day, the Court entered an Order setting a briefing schedule on the Urgent Motion and requiring that any response shall be filed on or before May 10, 2019, and any reply shall be filed on or before May 13, 2019. (ECF No. 6859.)

2. At that time, counsel for Wells Fargo did not have an appearance on file in this matter; and therefore, did not receive case filings through the CM/ECF system.

3. Counsel for the Special Claims Committee of the FOMB (the “SCC”) mailed a copy of the Urgent Motion to Wells Fargo’s registered agent, who received it on May 9, 2019, and forwarded it to Wells Fargo’s Legal Department that evening—mere hours before the deadline that the Court set for responses to the Urgent Motion.

4. Counsel for Wells Fargo worked diligently to retain local counsel and prepare a response to the Urgent Motion but could not do so by the May 10 deadline.

5. Because Wells Fargo did not become aware of the Urgent Motion until May 9 and because of the expedited briefing schedule entered by the Court, Wells Fargo was unable to comply with the Court’s First Amended Standing Order providing that parties must request extensions at least two business days prior to the relevant deadline and hereby requests that the Court excuse such noncompliance.

6. Counsel for Wells Fargo has conferred with counsel for the SCC, and counsel for the SCC consented to the requested relief. Additionally, so as not to prejudice SCC in preparing and filing its reply, Wells Fargo served a copy of the Limited Objection and Joinder on counsel for SCC on Sunday, May 12, 2019.

7. Pursuant to Paragraph 1(H) of the *Eighth Amended Notice, Case Management and Administrative Procedures* (ECF No. 4866-1) Wells Fargo hereby certifies that it has made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court, and does not believe that any party opposes the relief requested herein.

8. Accordingly, Wells Fargo respectfully moves for an extension of time up to and including May 13, 2019, to file its Limited Objection and Joinder, attached hereto as Exhibit A.

WHEREFORE, Wells Fargo respectfully requests that this Court grant it an extension to and including May 13, 2019, to file the *Limited Objection and Joinder of Wells Fargo to the Joint Limited Objection of Bank Defendants to Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders*, attached hereto as Exhibit A, and enter an order substantially similar to the proposed order attached hereto as Exhibit B.

Dated: May 13, 2019

/s/Roberto C. Quinones- Rivera  
MCCONNELL VALDÉS LLC  
Roberto C. Quiñones-Rivera, Esq.  
USDC-PR Bar No. 211512  
270 Muñoz Rivera Avenue  
Hato Rey, Puerto Rico 00918  
Telephone: (787) 250-2631  
Facsimile: (787) 759-9225  
E-mail: rcq@mcvpr.com

*Counsel to Wells Fargo Bank, National Association, Wells Fargo Clearing Services LLC AKA or FKA First Clearing LLC, and Wells Fargo Securities, LLC*